

FILED  
Clerk  
District Court

MAY 19 2006

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

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Attorney for Defendants LK Corporation,  
d.b.a. Rota Handicraft and Lee Byung Deuk

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF THE NORTHERN MARIANA ISLANDS

SAIPAN HANDICRAFT,

Plaintiff,

vs.

MICRONESIA WOODCRAFT ENT., INC.,


Defendants

Civil Action No. 05-0040

SUBMISSION OF SUPPLEMENTAL  
DECLARATION OF DEFENDANT  
LEE, BYUNG DEUK

COMES NOW Edward Manibusan, Esq., counsel for Defendants LK Corporation, dba  
Rota Handicraft and Lee, Byung Deuk, and hereby files the attached Supplemental Declaration of  
Lee, Byung Deuk.

RESPECTFULLY SUBMITTED this 19th day of May 2006.

  
Edward Manibusan, Esq.  
Attorney for Defendants LK Corporation,  
d.b.a. Rota Handicraft and Lee Byung Deuk.

ORIGINAL

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FOR THE  
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SAIPAN HANDICRAFT,

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vs.

MICRONESIA WOODCRAFT ENT., INC.,  
ET. AL.,

Defendants.

Civil Action No. 05-0040

SUPPLEMENTAL DECLARATION  
OF LEE, BYUNG DEUK

I, LEE, BYUNG DEUK, do hereby declare under penalty of perjury that the foregoing is true and correct:

1. I am the President of L.K. Corporation, dba Rota Handicraft and have personal knowledge of the matters set forth herein.
2. That I am a citizen of the Republic of Korea and am of Korean heritage.
3. That I have read and understand, through the use of a competent translator, the allegation in paragraphs 5 of Exhibit C attached to Plaintiff's Motion for Expanded Preliminary Injunction, entitled: "Declaration of Joe C. Cabrera," that: "Posing as a buyer, in February of 2006, [Joe C. Cabrera] learned from a manager at Haney that he could provide and sell 20,000 dolls each month. [Joe C. Cabrera] was led to visit

1 Haney by an employee of Defendant Lee, Byung Deuk.” See “Exhibit C”  
2 (“Declaration of Joe C. Cabrera”)  
3

4 4. That I never caused, ordered, or authorized, any agreement or transaction with  
5 Haney for L.K. Corporation, dba Rota Handicraft to provide twenty thousand  
6 (20,000) “Bo Jo Bo Wishing Dolls” a month.  
7

8 5. That, to the extent of my knowledge, no employee, associate, or authorized agent of  
9 L.K. Corporation, dba Rota Handicraft has agreed to or been involved in an  
10 agreement or transaction with Haney to provide twenty-thousand (20,000) “Bo Jo  
11 Bo Wishing dolls” a month.  
12

13 I declare under penalty of perjury under the laws of the United States of America that the  
14 foregoing statements are true to the best of my knowledge; and make this declaration on May 19,  
15 2006, in Gualo Rai, Saipan, Commonwealth of the Northern Mariana Islands  
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19 LEE, BYUNG DEUK  
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